

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

TODD C. BANK,

*Plaintiff,*

-against-

FLUENT, INC, and REWARD ZONE USA, LLC,

*Defendants.*

1:19-cv-6543-RRM-RLM

**NOTICE OF MOTION**

**PLEASE TAKE NOTICE** that, upon the accompanying memorandum of law and all other pleadings and proceedings herein, Plaintiff, Todd C. Bank, will move this Court, on a date and at a time to be designated by the Court, before Roslynn R. Mauskopf, United States District Judge, for an Order: (i) striking, pursuant to Rule 12(f)(2) of the Federal Rules of Civil Procedure, portions of Defendants' Answer (Dkt. No. 8) to the Amended Complaint (Dkt. No. 7); and (ii) granting, to Plaintiff, any other lawful and proper relief.

Dated: January 13, 2020

Respectfully submitted,

*s/ Todd C. Bank*  
TODD C. BANK  
ATTORNEY AT LAW, P.C.  
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(718) 520-7125  
By Todd C. Bank

*Counsel to Plaintiff*

TO: KLEIN MOYNIHAN TURCO LLP  
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New York, New York 10123  
(212) 246-0900

*Counsel to Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and accurate copy of this document, and the accompanying memorandum of law, is being filed electronically on January 13, 2020, via the Court's electronic-case-filing (ECF) system. Notice of this filing will be sent by the Court's ECF system to all parties, and copies will be mailed to those parties, if any, that are not served in such manner.

Dated: January 13, 2020

*s/ Todd C. Bank*  
Todd C. Bank